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September 14, 2023

David Pritchard, Esq  
Assistant U.S. Attorney  
167 North Main Street, 8<sup>th</sup> Floor  
Memphis, TN 38103

**Re: United States v. Tadarrius Bean**  
**District Court No. 2:23-cr-20191-MSN**

Dear Mr. Pritchard:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure and Local Criminal Rule 15.1 in lieu of a formal motion, I am hereby requesting discovery in the above styled criminal case with particular regard to the Indictment. This request includes but is not limited to the following:

1. Written or recorded statements made by the defendant.
2. Any written record containing the substance of an oral statement by the defendant.
3. The substance of any oral statement by the defendant made before or after arrest in response to interrogation by a government agent known to the defendant.
4. Recorded testimony of the defendant before a grand jury relevant to the offense charged.
5. The defendant's prior criminal record.
6. Documents and tangible objects including but not limited to books, papers, photographs, tangible objects, buildings, or places which are material to the defendant's defense preparation or intended for use by the government at trial as evidence in chief or obtained from the defendant.

7. Results or reports of physical or mental examinations and scientific tests or experiments.

8. A written summary of testimony, witnesses' opinions, the bases and the reasons for those opinions, and the witnesses' qualifications of expert witnesses that the government intends to use under Rules 702, 703, or 705 of the Federal Rules of Evidence in its case-in-chief at trial.

9. Co-conspirator's statements.

10. Exculpatory evidence or evidence that may lead to exculpatory evidence.

11. A list of the names, addresses and present location of each and every person interviewed by the Government as a prospective, possible or potential witness in this case, whether or not the Government now intends to call such person as a witness in its case-in-chief at trial, including but not limited to informants/witnesses who participated in the activities of the conspiracy alleged, and informants/witnesses who were present during any act by the defendant, co-defendant or co-conspirator in furtherance of any alleged conspiracy in the indictment.

12. A list of the names and addresses of each and every law enforcement officer, or officer of any agency, whether federal or state, involved in the investigation of this case.

13. A statement as to whether or not the Government intends to offer any foreign documents or witnesses who reside outside the United States and if so, to disclose such documents and state the names and addresses of such witnesses without delay and in an expedited manner.

14. Disclosure of any identification procedure, if any, that has been used in an attempt to elicit photographic or other identification of the defendant whether or not it resulted in a positive identification and, if so, the name and address of such witness, the method of identification, name and address of any law enforcement officer present at the identification, the photographs or other items used in the identification procedure, and any and all other information concerning the identification procedure.

15. Disclosure of any searches that were conducted in connection with this matter, whether by warrant, or not, and whether resulting in the seizure of evidence or not, and if so disclose the date, time and location of each search, and if by warrant copies of all documents associated with said warrant, copies of any documents seized, or inspection of any items seized.

You are to consider the above requests as a continuing request, and you are reminded of your continuing duty to provide discovery to the defendant. Please provide copies of all items requested above and provide information where items which cannot be copied may be inspected.

Sincerely,

PERRY GRIFFIN, PC

/s/ John Keith Perry, Jr.

John Keith Perry, Jr.  
Attorney at Law